

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
FREEDOM LAW FIRM, LLC
8985 South Eastern Ave., Suite 100
Las Vegas, NV 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
Email: info@freedomlegalteam.com
Attorneys for Plaintiff Shane Carlson

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Shane Carlson,

Plaintiff,

vs.

TransUnion, LLC, Experian
Information Solutions, Inc., Equifax
Information Services, LLC, and IQ
Data International, Inc.,

Defendants.

Case No.: 2:23-cv-00967-GMN-BNW

**Discovery Plan and Scheduling
Order Submitted in Compliance
with LR 26-1(b)**

On July 17, 2023 Defendant IQ Data International, Inc., appeared in this case. The Court set a deadline to file a proposed discovery plan and scheduling order by August 31, 2023. Accordingly, Shane Carlson; and IQ Data International, Inc., (collectively as the “Parties”), by and through their respective counsel, hereby submit this Joint Discovery Plan and Scheduling Order. The parties will require 180

1 days of discovery measured from the date that IQ Data International, Inc filed its
 2 answer to Plaintiff's complaint.

3 **DISCOVERY PLAN**

4
 5 The parties propose the following discovery plan and scheduling order:

- | | | |
|----|---|-------------------|
| 6 | 1. Initial disclosures | September 8, 2023 |
| 7 | 2. Amend pleadings and add parties .. | October 2, 2023 |
| 8 | 3. Expert disclosures (initial): | November 1, 2023 |
| 9 | 4. Expert disclosures (rebuttal): | December 1, 2023 |
| 10 | 5. Discovery cutoff date: | January 17, 2024 |
| | 6. Dispositive motions: | February 16, 2024 |
| | 7. Pretrial order | March 18, 2024 |

11 In the event that dispositive motions are filed, the date for filing the joint
 12 pretrial order shall be suspended until **30 days after** decision on the dispositive
 13 motions or until further order of the court.

14
 15 Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any
 16 objections thereto, shall be included in the joint pretrial order.
 17

18 Extensions or Modifications of the Discovery Plan and Scheduling Order:
 19 Applications to extend any date set by the discovery plan, scheduling order, or other
 20 order must comply with the Local Rules.
 21

22 Protective Order: The parties may seek to enter a stipulated protective order
 23 pursuant to Rule 26(c) prior to producing any confidential documents.
 24
 25
 26
 27
 28

1 Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and
2 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
3 served by sending such documents by email.
4

5 Alternative Dispute Resolution Certification: The parties certify that they met
6 and conferred about the possibility of using alternative dispute-resolution processes
7 including mediation, arbitration, and early neutral evaluation. The parties have not
8 reached any stipulations at this stage.
9

10 Alternative Forms of Case Disposition Certification: The parties certify that
11 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and
12 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
13 The parties have not reached any stipulations at this stage.
14

15 Electronically Stored Information: The parties have discussed the retention
16 and production of electronic data. The parties agree that service of discovery by
17 electronic means, including sending original electronic files by email or on a cd is
18 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.
19
20

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

Electronic evidence conference certification: The parties further intend to present evidence in electronic format to jurors for the purposes of jury deliberations at trial. The parties discussed the presentation of evidence for juror deliberations but did not reach any stipulations as to the method as this early stage.

Dated: August 25, 2023.

FREEDOM LAW FIRM

/s/ Gerardo Avalos
 Gerardo Avalos, Esq.
 8985 South Eastern Ave., Suite 100
 Las Vegas, NV 89123
Counsel for Plaintiff Shane Carlson

Gordon Rees Scully Mansukhani

/s/ Sean P. Flynn
 Sean P. Flynn, Esq.
 300 S. 4th Street, Suite 1550
 Las Vegas, Nevada 89101
Counsel for Defendant IQ Data International, Inc.

SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: September 12, 2023